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Attorneys for Defendant  
NATIONAL RAILROAD PASSENGER CORPORATION

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA—SACRAMENTO DIVISION

LORIE ALMAZAN and ESTHER GALVEZ,	)	No. CIV S-04-1872 MCE PAN
	)	
Plaintiffs,	)	<b>STIPULATION AND ORDER RE</b>
	)	<b>CONTINUANCE OF DISCOVERY</b>
v.	)	<b>CUT-OFF</b>
	)	
AZIZURANMAN RAHMANI, SAYED A.	)	
KARIMI, individually and dba ORANGE CAB	)	
CO.; ORANGE CAB CO.; NATIONAL	)	
RAILROAD PASSENGER CORPORATION	)	
and DOES 1 to 20,	)	
	)	
Defendants.	)	

This lawsuit arises out of a motor vehicle collision on April 17, 2004 wherein plaintiffs allege that they were injured while riding in an Orange Cab Co. taxi, owned by SAYED A. KARIMI and operated by his agent, employee or contractor AZIZURANMAN RAHMANI.

Plaintiffs filed suit against National Railroad Passenger Corporation (NRPC), SAYED A. KARIMI, Orange Cab Co., and AZIZURANMAN RAHMANI. Plaintiffs had made diligent efforts to serve all defendants but had been unable to locate SAYED A. KARIMI, Orange Cab Co., and AZIZURANMAN RAHMANI.

The parties learned that Mr. Karimi had filed for bankruptcy protection. They have also been able to learn the identity of Mr. Karimi's insurance carriers. NRPC has been in touch with the insurance carrier who is represented by Dale Allen Jr. of Low, Ball & Lynch. NRPC is in discussion with Mr. Allen's client regarding the tender of its defense and indemnity of this matter.

1 While the Court has granted the parties permission to serve additional parties, NPRC's tender and  
2 Mr. Karimi's bankruptcy status have delayed the litigation.

3 Further, SAYED A. KARIMI, Orange Cab Co., and AZIZURANMAN RAHMANI have  
4 recently appeared in the action and discovery will need to be commenced against these defendants  
5 as well.

6 The present discovery cut-off date is July 15, 2005. The parties hereby stipulate that the  
7 discovery cutoff be continued to September 15, 2005. The parties further stipulate that the expert  
8 witness disclosure be continued until September 15, 2005 with supplemental disclosures to occur  
9 on September 30, 2005.

10 The parties request that this stipulation be adopted as the order of the court

11  
12 DATED: June 28, 2005

LOMBARDI, LOPER & CONANT, LLP

13 By: /s/ An H. Nguyen

14 An H. Nguyen  
15 Attorneys for Defendant  
NATIONAL RAILROAD PASSENGER  
CORPORATION

16  
17 DATED: June 27, 2005

FURTADO, JASPOVICE & SIMONS

18 By: /s/ Martin L. Jaspovice

19 Martin L. Jaspovice  
20 Attorneys for Plaintiffs

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1 DATED: June 28, 2005

LOW, BALL & LYNCH

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3 By: /s/ Dale Allen, Jr.


Dale Allen, Jr.

4 Attorneys for Defendants SAYED A. KARIMI,  
5 Orange Cab Co., and AZIZURANMAN  
6 RAHMANI.

7 **ORDER**

8  
9 IT IS SO ORDERED.

10 DATED: July 6, 2005

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12 MORRISON C. ENGLAND, JR.  
13 UNITED STATES DISTRICT JUDGE  
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